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FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

JAN 30 2007

at 8 o'clock and 49 min. P.M.  
SUE BEITIA, CLERK

ATTORNEY FOR PLAINTIFF

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

ROBERT SHEREZ,	)	CIVIL NO. 04-00390 JMS-KSC
	)	
Plaintiff,	)	
	)	SECOND SUPPLEMENTAL
vs.	)	DECLARATION OF ROBERT SHEREZ
	)	IN OPPOSITION TO THE
	)	DEFENDANTS' MOTIONS FOR
STATE OF HAWAII DEPARTMENT	)	SUMMARY JUDGEMENT; EXHIBITS
OF EDUCATION; PATRICIA	)	15-30; CERTIFICATE OF SERVICE
HAMAMOTO, Superintendent of Hawaii	)	
Schools, MEREDETH MAEDA, Principal,	)	Hearing: Feb. 12, 2007
Castle High School; SARA GRONNER OR	)	Time: 9:00 AM
GRONNA, Vice Principal of Castle High	)	Judge: Hon. J. Michael Seabright
School.	)	
	)	
Defendants.	)	
	)	Trial Date: March 28, 2007

**SECOND SUPPLEMENTAL DECLARATION OF ROBERT SHEREZ IN  
OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT**

STATE OF HAWAII )  
 ) SS  
CITY AND COUNTY OF HONOLULU, )

I, ROBERT SHEREZ, being first duly sworn upon oath  
and upon penalty of perjury deposes that:

1. Declarant is the Plaintiff in the above-

entitled action.

2. That after tendering the first Supplemental Exhibits in opposition to the Defendant's Motions for Summary Judgment, and discussing the Defendants arguments with my attorney, I took serious exception to the Defendant's statements that they replaced me with a more qualified GED teacher at the McKinley school for adults because the pass rate of my students was exceptional, and that was why students were still signing up for my course on the very day it was terminated early.

3. So I wanted to present further documentary evidence to the court that I am very well qualified and experienced in teaching the GED course and all high school courses, and have passed the Praxis National Teacher's license examination, which it is not my understanding that the person that replaced me had.

4. Exhibit "15" is a true copy of the E-Mail dated June 15, 2004, from my DOE Resource Teacher, Pualani Katsura of the DOE RRSC/ARLISE/RISE SpEd Classroom Teacher Training Program referring to "BECKY" (a supervisor in the Program), saying : "That

Becky thinks the world of you".

5. Exhibit "16" is a true copy of the E-Mail dated March 8, 2004, from my DOE Resource Teacher, Pualani Katsura of the DOE RRSC/ARLISE/RISE SpEd Classroom Teacher Training Program.

6. Exhibit "17" is a true copy of Kamehameha Schools ABSI staff letter dated November 7, 1990.

7. Exhibit "18" is a true copy of a letter of Reference from Candace Sullivan dated May 9, 2005.

8. Exhibit "19" is a true copy of a letter of recommendation from Candace Sullivan dated 10/25/2004.

9. Exhibit "20" is a true copy of a letter of recommendation from Michael Waters, parent of a student I tutored, dated 4-25-2006.

10. Exhibit "21" is a true copy of a letter of recommendation from Patrick M. Clemente, parent of a student I tutored, dated May 26, 2001.

11. Exhibit "22" is a true copy of a letter of recommendation from Dawn Naleieha, parent of a student I tutored, dated May 31, 2006.

12. Exhibit "23" is a true copy of a letter of recommendation from A.J. & MaryJean, Supervisors of DOH

housing of a student I tutored, dated September 1, 2005.

13. Exhibit "24" is a true copy of a letter of request that I tutor a Leeward District student and "you are the most appropriate person for the job" from Leeward District Officer Resource Teacher Michelle Matsumoto, dated March 24, 2003.

14. Exhibit "25" is a true copy of a letter of recommendation from Special Education Teacher Shawn Doo of Kailua High School for tutoring a student too violent to be allowed on campus and under court orders, dated 6/7/2006.

15. Exhibit "26" is a true copy of a letter of commendation and appreciation from Principal Maeda dated May 15, 1988 ( IT SHOULD BE FOR 1989), for donations for the graduation ceremony.

16. Exhibit "27" is a true copy of a letter of commendation and appreciation from Principal Maeda dated May 31, 1988, for donations for the graduation ceremony.

17. Exhibit "28" is a true copy of a letter of commendation and appreciation from Principal Maeda

dated May 16, 1990, for donations for the graduation ceremony.


19. Exhibit "29" is a true copy of a letter of "Notification of Employment Status To Employee" from the Windward District Educational Specialist Beverly Reidy dated June 1, 2006 stating: "This is notification that you have reasonable assurance of continuing employment in the same or similar capacity during the next school term which starts on August , 2006".

20. Exhibit "30" is a true copy of a "Individual Sick Slip" written by DR. Teri Neville of Tripler Hospital dated 11/10/99 stating; "Robert Sherez...to help stabilize violent psychiatrically ill child. His assistance was essential to keep the patient safe". The doctor deemed it necessary that I, Robert Sherez, Plaintiff, Tutor of the Student be present for safety.

Wherefore, Declarant respectfully requests that the

court deny the Defendant's Summary Judgement Motion and Grant Plaintiff's Counter Motion for Summary Judgement.

FURTHER DECLARENT SAYETH NAUGHT.

  
Robert Sherez

\_\_\_\_ Robert Sherez, Plaintiff